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1 2 3 4 5 6 7 8	STEVEN M. SCHATZ, State Bar No. 118356 CATHERINE E. MORENO, State Bar No. 264517 DYLAN G. SAVAGE, State Bar No. 310452 RALITZA S. DINEVA, State Bar No. 305974 WILSON SONSINI GOODRICH & ROSATI Professional Corporation 650 Page Mill Road Palo Alto, CA 94304-1050 Telephone: (650) 493-9300 Facsimile: (650) 565-5100 Email: sschatz@wsgr.com		
10			
11	UNITED STATES DISTRICT COURT		
12	NORTHERN DISTRICT OF CALIFORNIA		
13	SAN JOSE DIVISION		
14	PINNACLE VENTURES LLC; PINNACLE)	CASE NO.: 18-cv-03412-BLF	
15	VENTURES DEBT FUND III, L.P.; PINNACLE IV, L.P.,	(Santa Clara County Superior Court	
16	Plaintiffs,	Case No. 18CV329145) Hon. Beth Labson Freeman	
17	v.)		
18	BERTELSMANN EDUCATION SERVICES) LLC,	STIPULATED [PROPOSED] ORDER SEALING CONFIDENTIAL INFORMATION IN COURT'S	
19	Defendant.	FEBRUARY 11, 2020 ORDER	
20		Action Filed: June 5, 2018 Removal Filed: June 8, 2018	
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18-cv-03412-BLF

STIPULATED [PROPOSED] ORDER

STIPULATED [PROPOSED] ORDER

Pursuant to the Court's February 11, 2020 Order Conditionally Sealing February 11, 2020 Order Deferring Ruling on Pinnacle's Anti-SLAPP Motion and Granting Pinnacle's Motion to Dismiss with Leave to Amend; and Directing Parties to Meet and Confer on a Stipulated Sealing Request (ECF No. 103) (the "Order"), the parties hereby STIPULATE AND AGREE, and respectfully request that the Court order, that the following portions of the Order, which reflect confidential information or materials that were previously filed under seal, be maintained under seal:

Document	Portions to Be Filed Under Seal
Order	As highlighted in the version filed herewith, portions of pages: 2, 3, 5, and 8.

STIPULATED [PROPOSED] ORDER

18-cv-03412-BLF

1	IT IS SO STIPULATED.	
2	Dated: March 3, 2020	WILSON SONSINI GOODRICH & ROSATI
3		Professional Corporation
4		
5		By: <u>/s/ Catherine E. Moreno</u> Catherine E. Moreno
6		
7		650 Page Mill Road Palo Alto, CA 94304-1050
8		Telephone: (650) 493-9300 Facsimile: (650) 565-5100
9		Email: sschatz@wsgr.com cmoreno@wsgr.com
10		Telephone: (650) 493-9300 Facsimile: (650) 565-5100 Email: sschatz@wsgr.com
11		
12		Attorneys for Defendant Bertelsmann Education Services LLC
13		
14	Dated: March 3, 2020	GIBSON, DUNN & CRUTCHER LLP
15	Buted. March 3, 2020	GIBSON, BONN & CHOTOILER ELF
16		Ry: /c/ Brian M. Lutz
17		By: /s/ Brian M. Lutz Brian M. Lutz
18		555 Mission Street, Suite 3000
19		San Francisco, CA 94105-0921 Telephone: 415.393.8379
20		Facsimile: 415.374.8474 Email: BLutz@gibsondunn.com
21		Eman. Beutz@giosondumi.com
22		Attorneys for Plaintiffs Pinnacle Ventures LLC; Pinnacle Ventures
23		Debt Fund III, L.P.; Pinnacle IV, L.P.
24		
25	PURSUANT TO STIPULAT	TION OF THE PARTIES, IT IS SO ORDERED.
26		
27	Dated:	Honorable Beth Labson Freeman
28		United States District Court Judge
	-	
	STIPULATED [PROPOSED] ORDER	-2- 18-cv-03412-BLF

ATTESTATION PURSUANT TO LOCAL RULE 5-1(i)(3) This certifies, pursuant to Civil Local Rule 5-1(i)(3), that all signatories to this document concur in its content and have authorized this filing. Dated: March 3, 2020 /s/ Catherine E. Moreno Catherine E. Moreno